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7 Attorney for Defendant Dino Sisneros

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10 THE UNITED STATES OF AMERICA,) Case NO. 11CR-00794-01
11)
12 Plaintiff,) MOTION FOR DISCLOSURE; MOTION TO
13 vs.) UNSEAL APPLICATION FOR SEARCH
14) WARRANT (IF APPLICABLE), AFFIDAVIT
15 1. DINO SISNEROS,) IN SUPPORT OF SEARCH WARRANT,
16) SEARCH WARRANT, AND INVENTORY FROM
17 Defendant.) SEARCH WARRANT
18)
19)
20)
21)
22)
23)
24)
25)

26 Excludable delay under 18 U.S.C. 3161(h)(1)(F) will occur as a
27 result of this motion or of an order based thereon.

28 Defendant, by and through counsel undersigned, hereby moves
29 this Court for an order to unseal the application for search warrant
30 (if applicable), affidavit in support of search warrant, search
31 warrant, and any inventory for all items seized from the search
32 warrant in Case No. 07-00703-M. The materials at issue were seized
33 from Defendant Sisneros' residence. These materials are included
34 apparently in the Government's disclosure in this matter. Counsel
35 undersigned thought that this issue was solved at the last pretrial
36 conference, but apparently not. Counsel undersigned has been told by
37 the Government that the Government will not disclose these materials

1 without a court order mandating disclosure and unsealing these
2 materials.

3 The Government, per Jon Granoff, has no objection to this
4 motion.

5 WHEREFORE, Defendant moves this Court for an order unsealing
6 the documents at issue in Case No. 07-00703M and ordering the
7 Government to disclose same.

8 RESPECTFULLY SUBMITTED this 24th day of Aug., 2011.

9 /s/Matthew C. Davidson
10 Matthew C. Davidson,
11 Attorney for
12 Defendant

13 Copy of the foregoing
14 Efiled this 24th day of
15 Aug., 2011 to;

16 Assistant United States Attorney

17 Co-Counsel

18 By: MCD
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